

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
GREGORY ELEFTERAKIS, ROMAN POLLAK,  
ANTHONY BRIDDA, NICHOLAS ELEFTERAKIS,  
NICHOLAS LIAKIS, and IME COMPANIONS LLC,

Defendants.  
-----X

SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against-

CARLOS ROA,

Third-Party Defendant.  
-----X

CARLOS ROA,

Third-Party Counter-Claimant,

-against-

SAFA ABUDLRAHIM GELARDI, VITO GELARDI,  
and IME COMPANIONS, LLC,

Third-Party Counter-Defendants.  
-----X

Case No.: 1:22-cv-1032 (PKC) (JRC)

**REPLY DECLARATION OF  
MAYRA GOMEZ IN FURTHER  
SUPPORT OF PLAINTIFF'S ORDER TO  
SHOW CAUSE FOR CONTEMPT AND  
FOR AN ORDER OF ATTACHMENT  
PURSUANT TO RULE 64 OF THE  
FEDERAL RULES OF CIVIL  
PROCEDURE & ARTICLE 62 OF  
THE NEW YORK CIVIL  
PRACTICE LAW & RULES**

Mayra Gomez declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am an independent contractor who performs services for IME WatchDog, Inc. (“IME WatchDog”), the Plaintiff in the above-captioned case.

2. As such, I am fully familiar with the facts and circumstances set forth below, based upon the facts known to me to be true, a review of my records, conversations with principals of IME WatchDog, and this Court’s Orders.

3. I previously performed services for Defendant IME Companions LLC; however, I stopped doing so when Defendant Safa Abdulrahman Gelardi (“Safa Gelardi”) spoke to me with a belligerent tone due to a payment dispute.

4. On April 19, 2023, I was scheduled to observe an independent medical examination (“IME”) conducted by Dr. Teresa Habacker, whose office is located at 4223 Francis Lewis Boulevard, Bayside, NY 11361.

5. At approximately 12:40 PM that day, I was approached by a Spanish Interpreter who asked me whether I was the assigned observer for one Rafael Cuaxil.

6. I told him I did not have him on my list for the day, but that I would check with the IME WatchDog office to find out.

7. Upon doing so, I was advised that no such individual was on IME WatchDog’s schedule for that day.

8. Once I got off the phone, I overheard the receptionist yell to the interpreter words to the effect of: “Rafael Cuaxil is here.”

9. I observed that Mr. Cuaxil was accompanied by a tall Hispanic male of light skin complexion, who had facial hair, but was bald.

10. Attached hereto as **Exhibits “A”** and **“B”** are pictures that contain a fair and accurate representation of what I witnessed that day. I took these pictures with my cellular phone.

11. Later that day, I showed Carlos Roa pictures of this individual, and I was informed by him that this individual is Fari Gutierrez ("Gutierrez"), an agent of IME Companions, who recently formed Client Exam Services LLC ("CES").

12. I did not engage with Gutierrez in the pictures, as I have been instructed by the principals of IME WatchDog to refrain from any contact with the Defendants.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 2, 2023.

*Mayra Gomez*

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Mayra Gomez

# EXHIBIT A



# EXHIBIT B










# 2023-05-02 FINAL Reply Declaration of Mayra Gomez

Final Audit Report

2023-05-02

Created:	2023-05-02
By:	Emanuel Kataev (mail@emanuelkataev.com)
Status:	Signed
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